

Wallace  
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August 08, 2001

W. R. Grace & Co.  
Attention: Akos L. Nagy  
7500 Grace Drive  
Columbia, MD 21044

Invoice #12254

For Professional Services Rendered in Connection with Honeywell, Inc. - Matter 6

Professional Services:

		<u>Hours</u>
06/01/01 BB	Consult with Ms. Pelletier re expert and rebuttal expert reports and distribution arrangements to experts and attorneys (.4 hrs.); place follow up calls to local counsel re same (.3 hrs.); prepare fax of pertinent document for case expert for Mr. Hughes (.3 hrs.); coordinate, prepare and scan defendant's expert reports and prepare letters and FedEx packages of same to all experts for Ms. Pelletier (6.3 hrs.); deliver same to FedEx for shipment (.5 hrs.).	7.80
CHM	Review Honeywell expert reports (Rivkin, Hart, and Demming) and prepare simultaneous outline of key points (3.6 hrs.); draft declaratory judgment section of CERCLA Section 107 brief (2.8 hrs.); conference with Dr. Goad re Costa and Rivkin deposition preparations (.8 hrs.)	7.20

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		<u>Hours</u>
06/01/01	TM Per the request of Mr. Marraro in preparation for upcoming deposition prepared deposition books (1.2 hrs.); incorporate new documents into case files (1.3 hrs.).	2.50
	FPP Discussion with Ms. Pelletier regarding assignment to research and gather all reports on sites 15 and 1120.	1.00
	AP Call with Akos Nagy re Grace accounting procedures and documents (.6 hrs.); research for motion for summary judgment (7.0 hrs.).	7.60
	WH Draft motion for partial summary judgment on CERCLA 107 claim (7.0 hrs.); conference with Mr. Zacaroli re research in support of same (.5 hrs.); research in support of strict liability brief (1.4 hrs.).	8.90
	MM Office conference with Ms. Pelletier re discovery projects to be completed (.2 hrs.); office conference with Mr. Pittman re same (.3 hrs.); review Grace databases for site reports (i.e., site 15, 120, and 157) per Ms. Pelletier's request (1.9 hrs.); forward e-mail to Mr. Pittman to continue the process of producing various site reports as stated previously (.2 hrs.); review case pleading files and produce requested documents for Ms. Pelletier's review (.8 hrs.); case management (.2 hrs).	3.60
06/02/01	AP Research regarding CERCLA, piercing corporate veil in preparation for drafting Motion for Summary Judgment on Honeywell's claims.	8.30
	BB Scan additional expert report from defendant and email all expert reports to attorneys, case expert and local counsel for Ms. Pelletier (.5 hrs.); review and quality check copies of	3.00

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		<u>Hours</u>
	supplemental expert supporting documents for Ms. Parker and prepare for production (1.8 hrs.); prepare index of supporting documents from plaintiffs' produced documents (.7 hrs.).	
06/02/01	FPP Research document index for specific reports.	4.00
06/03/01	AP Research and prepare draft Motion for Summary Judgment on behalf of Grace & Co. and Grace Ltd.	10.10
	FPP Research document index and extract specific reports.	2.50
06/04/01	TM Analyzed new case documents and incorporate into case files (2.0 hrs.); retrieved documents for Ms. Parker re summary judgment exhibits to Bill Miller's declaration (.5 hrs.).	2.50
	AP Calls with Jack McFarland regarding declaration in support of Summary Judgment briefs (.8 hrs.); conference with C. Marraro and B. Hughes regarding Summary Judgment briefing (1.1 hrs.); research Spill Act for Summary Judgment brief (4.0 hrs.); research RCRA issues relating to Grace & Co. and Grace Ltd. (6.1 hrs.).	12.00
	FPP Research document index for specific reports (2.0 hrs.); locate and extract documents for use by Ms. Pellitier (3.0 hrs.); review deposition transcript for specific information for use by Mr. Hughes (2.0 hrs.).	7.00
	CHM Conference call with Sciences International re fee issues (.3 hrs.); conference call with SAI re expert fees (.5 hrs.); conference call with GeoMega re expert fees (.3 hrs.); conference with Knight Piesold re expert fee issues (.5 hrs.); conference with Dr. Costa re expert fees	8.30

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Hours

issues (.2 hrs.); review first draft summary judgment of license agreement brief (.7 hrs.); conference M. Flax re same (.2 hrs.); prepare Mr. McGuire for expert deposition (5.6 hrs.).

06/04/01 BB	Consult with Ms. Parker re summary judgment exhibits (.3 hrs.); review draft summary judgment memorandum and research case files and production databases for pertinent documents (3.2 hrs.); collect and cordinate pertinent documents for summary judgment brief (2.0 hrs.); collect and prepare documents in preparation for 6/6/01 deposition for Mr. Marraro (.8 hrs.); respond to inquiries from case experts and prepare and email pertinent documents (.4 hrs.); review, coordinate and prepare production of documents in support of experts' reports (1.7 hrs.); prepare FedEx packages for shipment to opposing counsel (.5 hrs.); collect, prepare and fax of pertinent documents for case expert (.4 hrs.).	9.30
WH	Draft opposition to Honeywell's motion in limine re Dr. Anderson and Hugh McGuire (2.4 hrs.); conference with Ms. Flax re same (.4 hrs.); work on RCRA partial summary judgment motion (6.0 hrs.); conference with Mr. Marraro and Mr. Goad re expert depositions and summary judgment motions (.4 hrs.); confer with Ms. Pelletier re assignments (.2 hrs.).	9.40
TP	Proofreading and revising draft of summary judgment declarations including identifying and requesting supporting exhibits (6.0 hrs.); instructing Ms. Self on formatting changes needed (.8 hrs.); several telephone conferences with Dr. Anderson's office, email to Ms. Banks re Dr. Anderson's additional supporting documents to be produced and updated Dr.	8.40

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Hours

Anderson's bibliography to reflect telephone conference with her office (1.3 hrs.); drafted letter to Caffrey and Boenning re documents being produced (.3 hrs.).

06/05/01 BB	Consult with Ms. Parker and Mr. Hughes re assignments (.2 hrs.); research production databases and collect, coordinate and prepare exhibits for summary judgment motion for Ms. Parker (7.5 hrs.); provide pertinent case expert information for Mr. Marraro (.1 hrs.); follow up on 5/01 deposition transcript for Mr. Hughes (.2 hrs.); collect and prepare pertinent produced documents for plaintiff and arrange for copying and delivery for Mr. Hughes (1.1 hrs.); cite check partial summary judgment brief for Ms. Parker (1.4 hrs.).	10.50
FPP	Research CD's of produced documents and print requested reports.	7.50
AP	Research and draft Summary Judgment brief on Grace & Co.	8.30
TP	Making changes to summary judgment on CERCLA 113 claim including checking exhibits to brief, drafting index of exhibits (5.0 hrs.); office conference with Ms. Banks re preparing exhibits (.5 hrs.); reviewed Geraghty & Miller report and various correspondence to identify those appropriate for use as exhibits, reviewed Wong transcripts to identify pages for use in summary judgment on CERCLA 113 claim (1.5 hrs.); called Mr. German re deposition (.1 hrs.).	7.10
WH	Draft and revise motion for partial summary judgment on RCRA claim (5.2 hrs.); factual research in support of same (4.2 hrs.); conference with Mr. Nye regarding human	9.70

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		<u>Hours</u>
	health risk issues in connection with RCRA motion (.3 hrs.).	
06/05/01 RM	Westlaw research for Mr. Hughes re strict liability or ultra hazardous activity involving chromium in New Jersey cases (.7 hrs.); discuss same with Mr. Hughes (.1 hrs.).	0.80
CHM	Edit first three sections of RCRA summary judgment brief.	4.20
06/06/01 CHM	Defend McGuire expert deposition in New Jersey (7.2 hrs.); prepare memo for file re McGuire deposition (.6 hrs.).	7.80
PCC	Review and revise Grace summary judgment brief on Grace & Co., and Grace Ltd.	3.00
TM	Prepare table of contents for the summary judgment on contribution under Section 113 of CERCLA (.5 hrs.); pulled and copied invoices showing costs Grace and ECARG have incurred regarding clean-up of the site (1.5 hrs.); analyzed and incorporated new documents into case files (.4 hrs.).	2.40
TP	Correspond with Ms. Manago and Ms. Banks requesting copies of Bill Miller declaration and reviewed invoice related to site and summary of costs paid by Grace and ECARG for exhibits to declaration (.8 hrs.); reviewed letters from Honeywell counsel re expert documents that they claim have not been produced and office conference with Ms. Banks re confirming production complete and phone calls to experts re whether they have any of the documents that Honeywell counsel is seeking (2.2 hrs.); reviewed expert report for deposition of Ben Ross (1.9 hrs.).	4.90

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		<u>Hours</u>
06/06/01 FPP	Research index and gather exhibits to be used in brief at the request of Ms. Pellitier.	8.30
AFK	Telephone conference with Mr. Marraro re summary judgment motions (.2 hrs.); review and revise draft (1.7 hrs.); research re same (.5 hrs.); conferences with Messrs. Hughes and Condron re same (.3 hrs.).	0.30
WH	Revise section of motions for partial summary judgment on CERCLA 107 and 113 claims (7.1 hrs.); factual research in support of same (1.7 hrs.).	8.80
ACZ	Research for B. Hughes on application of strict liability under the New Jersey Spill Act.	3.00
BB	Continue cite check of partial summary judgment brief for Ms. Parker (.5 hrs.); consult with Mr. Hughes re assignment (.1 hrs.); place calls to and email case expert re pertinent documents for summary judgment motion for Mr. Hughes .3 hrs.); research files, collect and prepare pertinent documents re summary judgment motion for Mr. Hughes (5.8 hrs.); collect, prepare, review and prepare fax of pertinent site document re 6/6/01 deposition to Mr. Marraro for Ms. Pelletier (.5 hrs.); consult with Ms. Parker re results (.3 hrs.); review and analyze new case documents, correspondence and pleadings, coordinate and prepare for incorporation into existing case files (2.0 hrs.).	9.50
06/07/01 TM	Flagged production documents (2.2 hrs.); meeting with Ms. Banks regarding summary judgment briefing schedule and case coverage (1.0 hrs.); assisted Ms. Banks with the collection, review and copying of potential exhibits (1.0 hrs.).	4.20

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		<u>Hours</u>
06/07/01 ACZ	Research for B. Hughes on common-law strict liability in NJ (1.0 hrs.); discussions with B. Hughes regarding same and regarding declaratory judgments under CERCLA Section 107 (.2 hrs.).	1.20
WH	Finish drafting motion for partial summary judgment on RCRA claim for review by Mr. Marraro (9.7 hrs.); conferences with Mr. Marraro and ICO lawyers regarding same (.7 hrs.).	10.40
PCC	Office conferences with Mr. Hughes regarding motions.	0.50
NAB	Create list of exhibits to be used in summary judgment motion (2.5 hrs.); pull documents to be used in summary judgment motion (1.5 hrs.).	4.00
CHM	Conference with A. Nagy re case developments (1.4 hrs.); conference with J. Agnello re strategy issues on depositions (1.2 hrs.); conference with ICO re letter to Judge re Rifkin deposition (.3 hrs.); review draft to Judge (.2 hrs.); review Ross and Montgomery expert reports in preparation for Anderson deposition (1.6 hrs.); edit Grace & Co. brief (2.4 hrs.); various calls to reschedule Kanter deposition with Honeywell (.3 hrs.); draft evidence section on RCRA brief (2.2 hrs.); list exhibits for RCRA and CERCLA summary judgment briefs (1.4 hrs.).	11.00
AP	Conferences with C. Marraro and P. Condrón re CERCLA briefs (2.3 hrs.); research regarding Bestfoods case and applicable standards for subsidiary liability (3.0 hrs.); calls with Akos Nagy regarding declarations (1.2 hrs.).	6.50



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		<u>Hours</u>
06/07/01	FPP Research and gather exhibits to be used in brief at the request of Ms. Pellitier (5.8 hrs.); research and pull cases cited in brief (2.0 hrs.).	7.80
	DB Pull and copy documents to be used as exhibits in summary judgment motions.	8.50
	BB Assist Ms. Kelly in collecting pertinent documents (.5 hrs.); collect and prepare documents pertinent to summary judgment RCRA and CERCLA claims brief for Mr. Hughes (4.7 hrs.); arrange, coordinate and send email re attorney assistance for collection and preparation of additional exhibits (.4 hrs.); read all claims brief and prepare work sheet for exhibits (1.3 hrs.); incorporate new pleadings into case file (.6 hrs.); read, analyze new correspondence and documents and incorporate into case files (2.5 hrs.); prepare fax re pertinent court information to local counsel (.4 hrs.); incorporate deposition schedule into case calender and distribute to case attorneys, staff, local counsel and case expert (.6 hrs.); research case files for expert report supporting documents not provided to defendant for Ms. Parker and send email re results (2.3 hrs.).	13.30
	TP Prepared for and participated at Ross deposition (7.3 hrs.); prepared memo of notes summarizing deposition testimony (1.4 hrs.).	8.70
06/08/01	AP Calls with J. McFarland, D. Garvey, D. Cleary and A. Nagy regarding declarations in support of summary judgment (3.4 hrs.); conferences with P. Pittman regarding appendix in support of Summary Judgment (.7 hrs.); supervise production of appendix exhibits (1.7 hrs.);	8.30

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team meeting regarding Summary Judgment briefing (2.5 hrs.).

Hours

06/08/01	DB	Pull and copy documents to be used as exhibits in summary judgment motions.	5.60
	WH	Revisions to RCRA and CERCLA briefs (6.9 hrs.); conference with team members regarding status of briefs and related tasks (.8 hrs.); continue collecting evidence in support of motions (2.1 hrs.).	9.80
	TP	Telephone conference with Mr. Miller and emailed draft declaration (.8 hrs.); office conference with Mr. Marraro re substance of two Miller declarations and Mr. Miller's reaction to our requests for new declaration (.2 hrs.); meeting with Dr. Anderson, drafted declaration and prepared photo exhibits to accompany declaration (3.6 hrs.); office conference with Ms. Banks re status of producing documents from Dr. Anderson (.1 hrs.).	4.70
	MM	In preparation of upcoming filings of various motions, review case material and produce various documents to be used in the appendix of all filings (2.1 hrs.); office conference with Mr. Hughes re various documents to be produced from case material (i.e., declaration of David Cleary, reports, etc.) (1.2 hrs.); office conference with Mr. Marraro re same (i.e., produce copy of Donald Belsito's expert report (.2 hrs.); office conference with Ms. Flax re various preliminary matters regarding the motions to be filed (.6 hrs.).	3.10
	TM	Reviewed and updated correspondence and pleadings (1.3 hrs.); analyzed new documents and incorporate into case files (.8 hrs.);	3.10

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		<u>Hours</u>
	meeting with summary judgment team regarding weekend coverage assignments (.5 hrs.); meeting with Ms. Pelletier regarding summary judgment briefing schedule (.5 hrs.).	
06/08/01	NAB Create list of exhibits to be used in summary judgment motion and pull documents re same (2.5 hrs.); pull documents to be used in summary judgment motion (5.0 hrs.).	7.50
	CHM Conference with Dr. Shelnut to prepare for Dr. Belsito's deposition (2.4 hrs.); edit plaintiff's redraft of RCRA briefs (3.6 hrs.); review Belsito documents in preparation for Belsito preparation session (3.4 hrs.).	9.40
	FPP Gather documents for use in appendix to briefs (6.3 hrs.); prepare declaration for use with appendix (3.0 hrs.).	9.30
06/09/01	DB Pull and copy documents to be used as exhibits in summary judgment motions.	5.20
	FPP Gather documents for use in appendix to briefs (5.0 hrs.); prepare declaration for use with appendix (5.0 hrs.).	10.00
	WH Draft motion for partial summary judgment on strict liability claim (8.6 hrs.); review and revise motion for partial summary judgment regarding WR Grace & Co. and Grace Ltd. (1.8 hrs.); conferences with Ms. Flax regarding drafting motions, proposed orders and related papers (1.2 hrs.).	11.60
	MM In preparation of filing various motions, continue to review case material and produce documents to be incorporated in the appendix accordingly (3.4 hrs.); office conferences with	3.50

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		<u>Hours</u>
	Mr. Pittman, Ms. Flax , Ms. Pelletier and Mr. Hughes re same (.2 hrs.).	
06/09/01 TP	Assisted Mr. Marraro in identifying documents for deposition preparation (.3 hrs.); revised Dr. Anderson's declaration and exhibits thereto in accordance with Mr. Marraro's input (2.1 hrs.); assisted with identifying and preparing exhibits for summary judgment motions (1.3 hrs.).	3.70
NAB	Search for exhibits to be used in summary judgment motion and pull documents re same (7.0 hrs.); add documents to summary judgment exhibit list (3.0 hrs.).	10.00
AP	Draft CERCLA, Spill Act and RCRA arguments for Brief requesting Summary Judgment on Honeywell claims (5.9 hrs.); supervise gathering of exhibits and compilation of appendix (.9 hrs.).	6.80
ACZ	Research on NJ standards and federal common-law standard on piercing the corporate veil and the effect of parying the expenses of a subsidiary corporation (5.1 hrs.); additional research on related issues of corporate liability (3.1 hrs.).	8.20
CHM	Edit latest draft license agreement and Grace & Co. summary judgment briefs.	4.00
06/10/01 AP	Supervise compilation of appendix (.7 hrs.); redraft CERCLA argument per instruction of P. Condron (3.3 hrs); cite check briefs (2.0 hrs.).	6.00
DB	Pull and copy documents to be used as exhibits in summary judgment motions.	7.60

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		<u>Hours</u>
06/10/01	NAB Add documents to exhibit list for summary judgment (1.3 hrs.); pull documents to be used as exhibits in the summary judgment motion (4.0 hrs.).	5.30
	MM In preparation of filing various motions, continue to review case material and produce documents to be incorporated in the appendix accordingly (4.1 hrs.); office conferences with Mr. Pittman, Ms. Flax , and Ms. Pelletier re same (.3 hrs.); draft declaration of Julie Vanmiddlesworth with exhibits to be filed with stated motions (1.1 hrs.).	5.50
	WH Continue drafting and revising motion for partial summary judgment on strict liability claim (7.4 hrs.); revisions to RCRA and CERCLA motions (2.6 hrs.); conferences with team members regarding briefs (1.2 hrs.).	11.20
	CHM Review Dr. Shelnut's preparation outline for Dr. Belsito's (1.0 hrs.); prepare Dr. Belsito for deposition in New Jersey (5.0 hrs.); dinner meeting with Dr. Shelnutt and Dr. Belsito (2.4 hrs.).	8.40
	FPP Gather documents for use in appendix to briefs (4.0 hrs.); prepare declaration for use with appendix (3.8 hrs.).	7.80
06/11/01	NAB Copy document to be included in the appendix of the summary judgment motion.	2.50
	PCC Revise summary judgment brief on Grace & Co. and Grace Ltd. (6.0 hrs.); office conferences with Mr. Hughes, Ms. Pelletier and Ms. Flax (.5 hrs.).	6.50

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		<u>Hours</u>
06/11/01 RLS	Office conference with Mmes. Manago and Banks regarding AlliedSignal project (. 2 hrs.); review and incorporate expert reports into the case file (1.3 hrs.); scan reports into the computer and create a folder under the case file (.9 hrs.); update case file as necessary (.3 hrs.).	2.70
TM	Office conference with Mr. Smith and Ms. Banks regarding AlliedSignal project re the review and incorporation of expert reports into the case file (2.3 hrs.); scanning of expert reports into the computer (.6 hrs.); assisted Ms. Banks with the analysis and copying of litigation-related documents (.8 hrs.); analyzed new case documents and incorporate into case files (.8 hrs.).	4.50
BB	Scan and email pertinent document to Mr. Marraro (.3 hrs.); consult with Ms. Parker and Ms. Flax re filing preparation status and needs (.3 hrs.); review and quality check exhibits and cross-reference exhibits against list of exhibits and make corrections (9.3 hrs.); consult with Mr. Hughes and collect and prepare additional exhibits (1.5 hrs.).	11.25
FPP	Gather documents for use in appendix to briefs (3.5 hrs.); prepare declaration for use with appendix (2.0 hrs.); prepare appendix index (5.0 hrs.).	10.50
MM	In preparation of filing various motions, continue to review case material and produce documents to be incorporated in the appendix accordingly (3.7 hrs.); office conferences with Mr. Pittman, Ms. Flax, Ms. Pelletier, Ms. Banks and Mr. Hughes re status of pending matters re motions (.4 hrs.); review and bates stamp first part of documents to be incorporated into the motions (1.2 hrs.); search	6.10

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Hours

Lexis-Nexis and produce case, *Byrne v. Zurich* as requested by Ms. Flax (.3 hrs.); other miscellaneous tasks (.5 hrs.).

06/11/01 TP	Conference with Mr. Hughes re Askos Nagey declaration, send draft to Mr. Nagy and telephone conference with him re changes (1.1 hrs.); phone calls and letter to Dr. Anderson to finalize declaration, exhibits and get executed and sent final to her for her files (1.3 hrs.); reviewed correspondence and documents as potential exhibits to the CERCLA 113 brief and conferences with Ms. Banks and Ms. Pelletier re same (3.6 hrs.); telephone conference with Mr. Miller re declaration re costs (.5 hrs.); telephone conference with Mr. W. Miller re executing his declaration and returning to me (.2 hrs.).	6.70
AP	Research CERCLA issues per instruction of B. Hughes (5.4 hrs.); supervise paralegals compiling appendix (1.5 hrs.); calls with Grace employees regarding declarations in support of motions (2.3 hrs.).	9.20
CHM	Defend Dr. Belsito's deposition (8.5 hrs.); prepare memo to file regarding Belsito deposition (.8 hrs.).	9.30
WH	Finish strict liability brief and confer with Messrs. Marraro and Wallace regarding same (5.5 hrs.); work on statements of undisputed material facts in support of motions (4.6 hrs.); review and comment on ICO's re-draft of RCRA motion (1.2 hrs.); meetings with team members regarding finalizing briefs and supporting papers (1.3 hrs.).	12.60

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		<u>Hours</u>
06/11/01	ACZ Research of parent corporation liability applied under the N.J. Spill Act (2.5 hrs.); discussions with A. Pelletier, C. Marraro re same (.2 hrs.); review of draft CERCLA summary judgment briefs (1.2 hrs.).	3.90
	DB Pull documents to be used in summary judgment motion. (1.1 hrs.); copy documents to be used in summary judgment motion (7.4 hrs.).	8.50
06/12/01	TM Reviewed, copied and assembled appendix material (1.8 hrs.); collected quality checked documents re RCRA/CERCLA brief (4.2 hrs.); consult with Ms. Parker re additional exhibits to Bill Miller's declaration (.3 hrs.).	6.30
	FPP Gather documents for use in appendix to briefs (1.4 hrs.); prepare declaration for use with appendix (1.0 hrs.); prepare appendix index (3.0 hrs.); incorporate new documents into appendix (2.0 hrs.).	7.40
	MM Continue preparation of filing various motions (2.0 hrs.); continue to review case material and produce documents to be incorporated in the appendix accordingly (2.8 hrs.); office conferences with Mr. Pittman, Mmes. Flax , Pelletier, and Banks re status of pending matters re motions (.2 hrs.); review and bates stamp remaining documents to be incorporated into the motions (1.1 hrs.); search Lexis-Nexis and produce case, <i>Jersey City Redevelopment Authority v. PPG Industries, Inc.</i> as requested by Ms. Flax (.3 hrs.); telephone conference with John J. Prout & Associates re request for deposition transcript of Mr. Wong (.2 hrs.); review drafts of motions to be filed and insert	7.60



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Hours

appendix information accordingly (.6 hrs.);  
other misc. tasks (.3 hrs.).

06/12/01 WH	Finalize CERCLA briefs (9.3 hrs.); revisions to statements of undisputed material facts in support of summary judgment motions (3.6 hrs.); conference with Mr. Marraro regarding RCRA and CERCLA briefs (.6 hrs.).	13.50
BB	Collect and prepare pertinent document for Ms. Pelletier re RCRA/CERCLA brief (3.4 hrs.); consult with Ms. Parker re expert declaration, telephone expert re changes and email final declaration (1.0 hrs.); arrange for duplication of exhibits (.2 hrs.); research case records for document pertinent to RCRA brief for Mr. Hughes (4.1 hrs.); proof and cite-check RCRA brief for Mr. Hughes (1.3 hrs.).	13.00
ACZ	Research for and work on summary judgment briefs under CERCLA Sections 107 and 113, including revisions to briefs and detailed review of each (7.1 hrs.); discussions with B. Hughes, A. Pelletier, M. Flax regarding CERCLA briefs (.5 hrs.); work with M. Moasser in arranging exhibits (2.7 hrs.).	10.30
TP	Reviewed Dr. Bell's expert report (.8 hrs.); attended Bell deposition (7.1 hrs.); telephone conference with Ms. Bank and other office staff re arrangements for duplicating color photos for exhibits to summary judgment (.4 hrs.).	8.30
CHM	Prepare Mr. Kanter for expert deposition in New Jersey (3.8 hrs.); edit redraft of Section 113 summary judgment brief (1.4 hrs.); work with Mr. Nagy on declarations (.6 hrs.); negotiate access agreement with NJ Attorney General's office (.3 hrs.); conference call with	10.90

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Hours

ECARG re same (.5 hrs.); edit draft agreement (.5 hrs.); work with Dr. Anderson on declaration including review of photographs to be included as exhibits (.8 hrs.); meeting with team re preparation of final briefs and discussion with team in same meeting of specific issues re summary judgment briefs (1.2 hrs.); rework sections of RCRA brief (1.8 hrs.).

06/12/01 PCC	Revise brief regarding liability of Grace & Co. and Grace Ltd. (4.1 hrs.); office conferences with Messrs. Marraro and Hughes, Ms. Pelletier and Ms. Flax (.6 hrs.).	4.70
NAB	Add documents to exhibit list for summary judgment motions and copy documents to be included in the appendix of the summary judgment motion (1.2 hrs.); copy documents to be included in the appendix of the summary judgment motion (3.4 hrs.); pull documents to be used in the summary judgment motion filing (3.0 hrs.).	7.60
SRW	Research New Jersey state case law for cases with language stating that for strict liability in an abnormally dangerous situation, the contamination of one's property per se satisfies the harm prong of the strict liability standard.	4.20
RLS	Review and organize the case file (1.5 hrs.); update case index accordingly (.5 hrs.); office conference with Ms. Banks (.2 hrs.); review and incorporate copies of Grace expert reports into the case file (3.1 hrs.).	5.30
DB	Pull documents to be used in summary judgment motion (3.0 hrs.); copy documents to be used in summary judgment motion (6.5 hrs.).	9.50

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		<u>Hours</u>
06/12/01	AP Review, revise and finalize briefs on motions for Summary Judgment (8.8 hrs.); conference regarding finalization of appendix (1.0 hrs.).	9.80
06/13/01	CHM Review and edit strict liability summary judgment brief (2.6 hrs.); several conferences with plaintiffs re RCRA brief (.7 hrs.); redraft "human health" section of RCRA brief (1.8 hrs.); final review of license agreement brief (.7 hrs.); redraft portions of section 113 brief (3.2 hrs.); final review of Grace & Co. brief (.5 hrs.); review T. Parker notes from Bell deposition (.5 hrs.)	10.00
	WH Finalize all motions for summary judgment and supporting papers (13.9 hrs.); coordinate service of same on Honeywell (2.6 hrs.).	16.50
	AP Cite check and proof briefs on motion for Summary Judgment (13.2 hrs.); finalize and serve moving package (4.5 hrs.).	17.70
	TM Consulted with Ms. Parker re additional summary judgment exhibits (.5 hrs.); copy and prepare appendix material for binding (4.1 hrs.); reviewed brief and inserted appendix cites (2.3 hrs.); cite check briefs and prepared table of authorities (1.4 hrs.).	8.30
	DB Copy documents to be used in summary judgment motion (7.0 hrs.); pull documents to be used in summary judgment motion (1.5 hrs.).	8.50
	SRW Research all state case law for strict liability cases where both prongs of the standard have been satisfied, abnormally dangerous and harm, and where the contamination of the property has caused a loss of business.	3.20

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		<u>Hours</u>
06/13/01	RLS Office conference with Mr. Moasser and Ms. Flax (.2 hrs.); perform a search of the case file for the case of <i>ICO v. Sneed</i> cited in the RCRA brief (.5 hrs.); prepare case for Ms. Flax (.4 hrs.); review and incorporate Grace expert report into the case file (.5 hrs.); assist with the preparation of the Grace briefs (3.4 hrs.).	5.00
	BB Complete proofing of RCRA brief, scan and email changes to Mr. Hughes (1.2 hrs.); consult with Ms. Flax re project (.3 hrs.); consult with Ms. Parker re expert's declaration (.1 hrs.); place follow-up telephone calls to case expert re pertinent expert documents for Mr. Marraro (.3 hrs.); collect and prepare pertinent documents from case files for Mr. Marraro (3.0 hrs.); proof and prepare summary judgment exhibit documents (12.1 hrs.); proof briefs in preparation for shipment (1.5 hrs.).	18.50
	FPP Insert correct citations into brief (3.5 hrs.); prepare table of authorities for briefs (6.0 hrs.).	9.50
	MM Office conferences with Ms. Flax and Ms. Pelletier re status of pending tasks in final preparation of filing all six motions (.8 hrs.); continue to review briefs and insert corresponding appendix pages (10.4 hrs.); finalize appendices (i.e. 4 volumes) (2.1 hrs.); search Westlaw for Ms. Flax re producing various cases (i.e., 1993 WL 217429, etc.) (.4 hrs.); review final versions of all briefs and their attachments for stated attorneys (1.6 hrs.); review and revise various Rule 56.1 statements for filing (.2 hrs.); office conference with Mr. Hughes and Mr. Marraro re additional tasks to be completed relating to the filing (.4 hrs.); assist in finalizing all briefs and their attachments and prepared them for filing (.2	16.60

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		<u>Hours</u>
	hrs.); various other tasks to assure that all six filings are sent out as agreed (.5 hrs.).	
06/13/01 KK	Assist Ms. Pelletier with preparation of summary judgment briefs.	4.00
PCC	Revise summary judgment and brief regarding license agreement (2.0 hrs.); edit brief on Grace & Co. and Grace Ltd. liability (1.0 hrs.); review and revise statement of undisputed facts (1.5 hrs.); office conference with Mr. Marraro regarding briefs (.5 hrs.).	5.00
ACZ	Additional review/revisions to CERCLA 107 summary judgment brief for B. Hughes (2.4 hrs.); review of summary judgment brief for strict liability claim (2.0 hrs.).	4.40
TP	Finalized notes from Bell deposition (1.2 hrs.); assisted in the review and finalizing of the five summary judgment motions, including the drafting of statements of undisputed facts and checked cites to appendix (6.2 hrs.).	7.40
06/14/01 CHM	Review Honeywell motion for summary judgment brief (2.5 hrs.); make assignments and prepare schedule for response (.6 hrs.); conference with local counsel re "entire controversy" issues (.5 hrs.); review Coop documents for deposition preparation (1.5 hrs.); prepare letter to Caffrey re additional documents (.2 hrs.).	5.30
KK	Assist Ms. Pelletier with filing of summary judgment briefs.	3.00
SVW	Finalize briefs and assist with filing.	3.20

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		<u>Hours</u>
06/14/01	FPP Reintegrate case material used in preparation of brief into existing case files.	0.80
	TP Reviewed Dr. Montgomery's report (1.0 hrs.); attended Dr. Montgomery deposition (5.9 hrs.); began drafting summary notes of impression of deposition (1.6 hrs.).	8.50
	BB Review filings, arrange for office duplication, and scan motions and email to attorneys (1.4 hrs.); attend meeting with Mr. Marraro (.4 hrs.); review, analyze, prepare and incorporate new correspondence and case documents into case files (2.4 hrs.); place telephone call to expert re pertinent site data for Mr. Hughes (.3 hrs.).	4.50
	MM Final preparation of filing six motions, continue to review briefs and insert corresponding appendix pages (1.6 hrs.); finalize appendices (.2 hrs.); review final versions of all briefs and their attachments for attorneys (1.1 hrs.); additional tasks to be completed relating to the filing (.2 hrs.); finalize all briefs and prepare for filing via FedEx and courier (.4 hrs.).	3.50
06/15/01	PCC Review and analyze Honeywell motion for summary judgment (1.0 hrs.); office conference with Messrs. Marraro and Hughes regarding Honeywell motion (.5 hrs.); legal research regarding scope of application of entire controversy doctrine in federal court action (3.5 hrs.).	5.00
	WH Review Honeywell's summary judgment motion and supporting exhibits and prepare notes re opposing same (4.1 hrs.); conferences with Mr. Condron and Ms. Pelletier regarding same (.9 hrs.); conferences with Messrs.	8.20

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		<u>Hours</u>
	Golliday and Brown regarding deposition (.4 hrs.); begin working on opposition brief (2.8 hrs.).	
06/15/01 MM	Office conference with Mr. Marraro re producing various deposition transcripts from case materials (Belsito and McGuire) (.1 hrs.); search case material and produce Belsito's deposition transcript (.3 hrs.).	0.40
TP	Prepare memo re Dr. Montgomery deposition and my impressions of her testimony (1.6 hrs.); telephone conference with Ms. Dumas re documents not produced by experts (.3 hrs.).	1.90
AP	Review Honeywell brief on Summary Judgment.	0.50
BB	Incorporate new pleadings and files into case files (6.0 hrs.); consult with Mr. Hughes and scan and email pertinent document to case expert for Mr. Hughes (.5 hrs.).	6.50
RLS	Review and incorporate new documents into case file (1.0 hrs.); organize and label documents (1.0 hrs.); update case file accordingly (.5 hrs.).	2.50
CHM	Team meeting to discuss assignments for "opposition" and outline significant issues for factual/legal research (2.6 hrs.); meeting with Dr. Nye re Dr. Anderson's deposition (1.0 hrs.); prepare Dr. Anderson (5.8 hrs.).	9.40
06/16/01 TP	Westlaw research on entire controversy doctrine.	0.60
WH	Review transcripts of Bell and Ross depositions in preparation of Dr. Brown's deposition (3.5 hrs.); review materials provided	4.40

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		<u>Hours</u>
	by Dr. Brown regarding remediation technologies (.9 hrs.).	
06/18/01 TP	Organizing files of expert materials and reports and compared lists of documents from Honeywell counsel with production and copy set and determined that some documents listed are included in production and copy sets and others were previously produced in litigation (3.2 hrs.); reviewed case related correspondence including letters re documents Honeywell's summary judgment motion (.3 hrs.); completed summary re Dr. Montgomery's deposition (1.3 hrs.); research re entire controversy doctrine (1.1 hrs.).	5.90
ACZ	Discussion with B. Hughes regarding research of CERCLA innocent landowner case law.	0.30
FPP	Identify and copy requested reports and other analytical materials for expert depositions.	5.30
WH	Conference with Messrs. Agnello, Marraro and Condron regarding opposition to Honeywell's motion for summary judgment (1.4 hrs.); work on opposition regarding CERCLA issues (2.3 hrs.); conference with Mr. Zacaroli regarding research assignments in connection with same (.7 hrs.); prepare for Dr. Brown's deposition and travel to NJ for same (5.2 hrs.)	9.60
PCC	Conference call regarding Honeywell brief (2.0 hrs.); legal research regarding veil piercing, summary judgment burdens, and attorney-client privilege under New Jersey and federal law (3.0 hrs.); draft section of opposition brief regarding corporate liability (1.5 hrs.).	6.50



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		<u>Hours</u>
06/18/01	MM Office conference with Ms. Pelletier re searching Lexis-Nexis/Westlaw for various cases (.3 hrs.); search Lexis-Nexis and Westlaw and produced various cases and provided all to Ms. Pelletier for review (2.8 hrs.).	3.10
	AP Meeting regarding brief in opposition to Summary Judgment (1.5 hrs.); research regarding statute of limitations for opposition to Summary Judgment (1.8 hrs.); review P. Chapman documents in preparation for deposition (4.5 hrs.).	7.80
	BB Consult with Ms. Parker re supporting documents for expert for Mr. Marraro (.1 hrs.); review and prepare pertinent documents for Ms. Parker and produce same (4.4 hrs.); respond to telephone call from expert re support documents for experts and arrange for duplication (.2 hrs.); prepare documents and cover letter for FedEx package to local counsel for Mr. Marraro (.4 hrs.); incorporate new correspondence into indexed case files (4.9 hrs.).	10.00
	CHM Prepare letter to M. Caffrey re additional Anderson documents (.3 hrs.); conference with J. Agnello re strategy issues on entire controversy (.8 hrs.); deposition preparation session for Dr. Anderson (7.2 hrs.).	8.30
	RLS Review supporting documents to Gary Hart's expert report (1.0 hrs.); print supporting documents for deposition preparation (3.5 hrs.).	4.50
06/19/01	BB Incorporate new correspondence into indexed case files (1.3 hrs.); research case files for pertinent documents and collect, prepare and fax documents for preparation of expert for	8.80

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Hours

deposition for Mr. Hughes (5.7 hrs.); review, prepare, coordinate and arrange for duplication of experts' supporting documents for plaintiffs' counsel for Ms. Parker (1.8 hrs.).

06/19/01	WH	Prepare Kirk Brown for his deposition (8.6 hrs.); conferences with Mr. Marraro regarding same and Dr. Anderson's deposition (.9 hrs.); research regarding applicability of RCRA land ban treatment standards to removed COPR materials (.7 hrs.).	10.20
	DB	Reviewed and organized incorporate recent correspondence and pleadings as well as updating index.	7.50
	CHM	Defend deposition of Dr. Anderson (7.8 hrs.); review P. Coop's documents in preparation for deposition (1.0 hrs.).	8.80
	RLS	Office conference with Ms. Banks (.1 hrs.); search for requested documents for Ms. Banks (1.0 hrs.); print and deliver (.1 hrs.); review supporting documents of Gary Hart's Expert Report (1.3 hrs.); search CDs and print documents (.3 hrs.).	2.80
	TM	Assist Ms. Banks with the incorporation of new documents into case files (1.2 hrs.); review Grace production documents for documents related to the HP Drilling Company (1.3 hrs.).	2.50
	TP	Further research re entire controversy doctrine.	1.30
	PCC	Draft veil piercing sections of opposition to Honeywell's summary judgment motion (6.5 hrs.); legal research regarding motion (2.0 hrs.).	8.50

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		<u>Hours</u>
06/19/01	AP Review documents in preparation for P. Chapman deposition defense (3.1 hrs.); attend deposition of Dr. Anderson (7.0 hrs.); attend deposition preparation of Dr. Brown (.9 hrs.).	11.00
06/20/01	WH Defend Dr. Brown's deposition (6.7 hrs.); conferences with Dr. Brown and Mr. Golliday regarding same and obtaining their assistance in preparing for depositions of Honeywell's experts (1.8 hrs.); review CERCLA caselaw re "response cost" issue (1.9 hrs.).	10.40
	CHM Preparation session with P. Coop (5.5 hrs.); review Aldredge deposition transcript to assist Mr. Coop in preparation for deposition (.7 hrs.); redraft section of Grace's knowledge for summary judgment opposition (1.8 hrs.); conference with P. Coop re issues for Hart deposition (.5 hrs.).	8.50
	AP Draft statement of facts for brief in oppositon to Honeywell's Motion for Summary Judgment.	3.30
	PCC Drafting corporate veil section of opposition to Honeywell's summary judgment motion (3.2 hrs.); research regarding location of Honeywell subsidiaries (1.0 hrs.); additional legal research for brief (1.0 hrs.).	5.20
	ACZ Research of application of innocent landowner defense, and other defenses, to subsequent purchasers of land under CERCLA.	1.30
	BB Continue incorporating new correspondence into indexed case files (.9 hrs.); consult with Mr. Hughes re case assignment in preparation for completion of final pretrial order form (.1 hrs.), review instructions in NJ District Court's Final Pretrial Order form, place call to District Court Deputy Clerk for required information	8.90

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Hours

and prepare letter of request for required information (.8 hrs.); research Pacer and download current NJ District Court Local Rules and prepare for attorneys (.5 hrs.); research production database and collect and prepare documents pertinent to preparation of expert for deposition for Messrs. Marraro and Hughes and prepare fax of same to local counsel (6.6 hrs.).

06/20/01	DB	Organize and incorporated recent correspondence and pleadings in case index.	1.50
	TP	Reviewed correspondence including pre-trial form and correspondence related to production of expert documents by plaintiffs (.2 hrs.); telephone conference with Mr. German re obtaining copies of documents produced by Grace experts (.2 hrs.).	0.40
06/21/01	PCC	Revise section of opposition brief regarding veil piercing (2.6 hrs.); office conference with Ms. Pelletier regarding ECARG accounting data (.4 hrs.).	3.00
	CHM	Defend deposition of Mr. Coop (4.2 hrs.); meeting with J. Agnello to discuss "opposition" brief on entire controversy, "knowledge" issue (2.2 hrs.); conference call with P. Goad to discuss meeting with NJDEP (.6 hrs.); conference with plaintiffs re Hackensack Riverkeepers case (.6 hrs.); meeting with Mr. McGuire in New Jersey re supplemental expert report (1.5 hrs.).	9.10
	BB	Continue incorporating new correspondence and supplemental expert supporting documents into indexed case files (5.7 hrs.); consult with Ms. Pelletier re materials ordered in preparation of Pretrial Conference Order form	6.30

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		<u>Hours</u>
	(.1 hrs.); prepare cover letter and FedEx package of summary judgment motions to case expert for Mr. Marraro (.5 hrs.).	
06/21/01 TM	Consult with Ms. Pelletier and Ms. Banks about the ordering of the official copy of both the state and federal NJ Court Local Rules (.5 hrs.); assist Ms. Banks with the copying of documents pertinent to the preparation of experts for deposition for Messrs. Marraro and Hughes (2.3 hrs.); organized case files and incorporate new material (1.5 hrs.).	4.30
ACZ	Additional research of application of the CERCLA innocent landowner defense to subsequent purchasers of contaminated land (2.0 hrs.); discussions with B. Hughes re same (.6 hrs.).	2.60
AP	Review correspondence (.8 hrs.); draft brief in opposition to Honeywell's Motion for Summary Judgment (5.2 hrs.); review RI Report and Honeywell documents in preparation for defense of Chapman deposition (2.0 hrs.).	8.00
TP	Further research re entire controversy doctrine and began memo re same.	2.30
WH	Work on opposition to Honeywell's motion for summary judgment (4.1 hrs.); conference with Mr. Valera regarding his deposition and critique of Peter Demming's expert report regarding geo-technical issues (.8 hrs.); review Demming report and exhibits thereto (1.8 hrs.).	6.70
DB	Review and file correspondence documents for incorporation into existings case files.	7.50

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		<u>Hours</u>
06/22/01	PCC Office conference with Mr. Marraro regarding opposition brief (.5 hrs.); legal research regarding entire controversy (4.5 hrs.); telephone conference with Ms. Flax regarding brief (.5 hrs.).	5.50
CHM	Review backlog of correspondence on case (2.5 hrs.); review transcripts of expert witnesses (McGuire, Ross, Belsito and Bell) (3.0 hrs.)	5.50
BB	Collect pertinent expert documents for Mr. Marraro (.2 hrs.); assist Ms. Pelletier and Ms. Parker with issues re production of expert supporting documents (.8 hrs.); respond to telephone inquiry from expert re depositions (.1 hrs.); prepare fax of pertinent materials for Mr. Hughes (.3 hrs.); research Westlaw for pertinent caselaw for Messrs. Hughes and Zacaroli (2.1 hrs.); review, coordinate and prepare supporting documents for preparation of expert for deposition for Mr. Marraro (5.1 hrs.); forward assignments for depositions of defendant's experts for Mr. Marraro (.2 hrs.).	8.80
AP	Conference with C. Marraro and T. Parker re production of Chapman documents (1.1 hrs.); review documents for deposition preparation of P. Chapman (1.0 hrs.); conference with T. Manago re case staffing issues and briefing/pre-trial schedule (2.3 hrs.); research regarding law of the case (3.7 hrs.).	8.10
WH	Prepare for Demming and James expert depositions (5.9 hrs.); conferences with Mr. Valera and Mr. Golliday regarding same (.8 hrs.); conferences with Mr. Condrón regarding opposition brief and entire controversy doctrine (.6 hrs.).	7.30

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		<u>Hours</u>
06/22/01	TP Telephone conference with Ms. Banks and Ms. Pelletier re production of Chapman supporting documents.	0.30
	NAB Per Ms. Pelletier's request scan documents to be sent to expert (.3 hrs.); copy documents to be sent to expert (.3 hrs.); redact documents to be sent to expert (.5 hrs.).	1.10
06/23/01	AP Read articles written by P. Chapman for deposition preparation session.	3.00
06/24/01	AP Read depositions of Bell and Montgomery (2.0 hrs.); prepare for meeting with P. Chapman, including review sampling and toxicity data (3.5 hrs.); review Chapman publications (3.5 hrs.).	9.00
06/25/01	BB Collect and prepare pertinent documents for preparation of expert for deposition for Mr. Hughes (7.0 hrs.); prepare email forwarding correction to plaintiff's expert report to case expert for Mr. Hughes (.2 hrs.).	7.20
	TP Compared list of documents in Ms. Dumas's letter with list of exhibits to ECARG comments and phone call with Ms. Dumas re same (.9 hrs.); emailed summary of conversation to Mr. Marraro indicating Ms. Dumas had not reviewed 3 boxes of documents prior to sending letter (.3 hrs.).	1.20
	ACZ Discussion with B. Hughes regarding response to Honeywell summary judgment brief (.5 hrs.); review of declaration of B. Miller (.8 hrs.); research for response to CERCLA, Spill Act arguments raised by Honeywell (3.5 hrs.).	4.80

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		<u>Hours</u>
06/25/01 DB	Started shifting case files down to create more space for correspondence and pleading binders at the front of the case files (3.5 hrs.); organized case file room to incorporate new case files (3.5 hrs.); scanned new pleading files (1.5 hrs.).	8.50
WH	Conferences with Mr. Davis regarding deposition and status of bench sale studies regarding reductive capacity of meadow mat (.8 hrs.); confer with Mr. Brown regarding preparing questions for James deposition (.6 hrs.); confer with Mr. Zacaroli regarding drafting CERCLA section of opposition brief and related research (.6 hrs.); work on opposition brief (1.9 hrs.); prepare for Walters and James depositions (3.9 hrs.).	7.80
CHM	Meeting with Kanter in New Jersey (1.0 hrs.); defend Kanter deposition (3.8 hrs.); attend Mr. Champman preparation session for deposition in New Jersey (3.0 hrs.); prepare summary of Kanter deposition (1.0 hrs.).	8.80
TM	Review Grace production documents (1.5 hrs.); analyze and incorporate new documents into case material (3.4 hrs.); perform attorney search request for various expert documents (.5 hrs.).	5.40
AP	Meet with Peter Chapman and Glen Milner in preparation for Chapman deposition.	8.50
PCC	Further research regarding entire controversy (4.0 hrs.); drafting and editing opposition brief (2.2 hrs.).	6.20



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		<u>Hours</u>
06/26/01 DB	Refiled case documents as marked in the case files (2.0 hrs.); created new files for case documents (2.0 hrs.).	4.00
BB	Consult with Messrs. Marraro, Hughes and Condon re research assignment (.2 hrs.); research production database and CD's for pertinent litigation-related documents, print and prepare same for Messrs. Marraro and Condon (6.3 hrs.); assist Ms. Parker in resolving production issues (.7 hrs.).	7.20
CHM	Meeting with team re expert document production (1.2 hrs.); prepare opposition brief on CERCLA 107-113 issues (2.5 hrs.); attend call with court on Rule 16 motion on Riverkeepers case (.5 hrs.); conference with J. Agnello (.5 hrs.); review deposition transcripts (Dr. Anderson and Montgomery) (2.4 hrs.).	7.10
TM	Review Grace production documents (1.0 hrs.); analyze and incorporate new documents into case material and copy relevant documents (4.8 hrs.); meeting with Ms. Parker and Ms. Banks (.5 hrs.).	6.30
ACZ	Draft segments of response brief to Honeywell summary judgment motion on CERCLA NJ Spill Act (4.0 hrs.); additional research of liability provisions of Spill Act, including what types of damages are available as response costs (3.4 hrs.).	7.40
AP	Attend and defend deposition of Peter Chapman (7.5 hrs.); review additional site data (1.0 hrs.).	8.50
TP	Organize research re entire controversy and prepar summary of research to Mr. Hughes (1.1 hrs.); meeting with Mr. Marraro, Ms. Pelletier	5.40

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Hours

and Ms. Banks re series of letters from Honeywell counsel wrongly complaining about document production and strategy to confirm what has been produced (.9 hrs.); conference with Mr. Agnello's office re documents (.4 hrs.); drafted letter to Ms. Dumas re document production (.5 hrs.); meetings and calls with FedEx, On-Site, Ms. Banks, Ms. Manago, Ms. Kelley and review of correspondence and billings to investigate and confirm production by Grace and receipt by Honeywell counsel of supplemental production by Drs. Champman and Anderson (2.5 hrs.).

06/26/01	PCC	Edit draft in Daylin's knowledge for opposition brief (3.0 hrs.); revise veil and piercing section (3.0 hrs.).	6.00
	WH	Prepare for Davis deposition (5.5 hrs.); confer with Dr. Davis and his staff regarding results of studies regarding reductive capacity of meadow mat (.7 hrs.); review documents regarding same and coordinate production to Honeywell (1.2 hrs.); confer with Dr. Brown regarding reviewing his deposition transcript and preparing questions for James deposition (.9 hrs.).	8.30
06/27/01	RM	Review letters received from plaintiffs and compare to documents produced to plaintiffs (2.7 hrs.); confer with Mr. Smith, Ms. Parker and Ms. Banks (.3 hrs.).	3.00
	WH	Site visit with Dr. Davis and Dr. Nye in connection with Davis deposition and prepare Dr. Davis for his deposition.	9.40
	BB	Assist Ms. Pelletier in locating packages (.4 hrs.); research production database, privilege document production files and CDs for	11.30

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Hours

pertinent contact dermatitis documents for Mr. Marraro (4.5 hrs.); analyze and cross-reference plaintiffs' lists of requested supporting expert documents against produced expert supporting documents and prepare summary for Ms. Parker (6.4 hrs.).

06/27/01 PCC	Drafting and editing opposition to Honeywell's motion for summary judgment.	1.50
AP	Review documents provided by J. McFarland relating to Channel merger (.7 hrs.); research regarding law of the case (3.3 hrs.); conference with T. Manago, B. Banks and T. Parker regarding expert documents (.5 hrs.); review and produce expert documents (1.5 hrs.).	6.00
RLS	Office conference with Ms. Banks regarding Allied project (.1 hrs.); scan documents into the computer in word format and forward to Ms. Banks (.4 hrs.); office conference with Mmes. Parker and Banks regarding document review (.2 hrs.); review documents supporting Grace expert reports to ensure that documents had been previously produced (3.3 hrs.).	4.00
TP	Prepared combined chart of all documents Honeywell claims are missing from Grace expert production and began confirming whether produced and adding comments to explain production (i.e. Bates number, publicly available, etc.) (3.3 hrs.); instructed legal assistants on how to confirm production and add comments (.3 hrs.); drafted letter to Mr. Field re expert documents produced and confirmed by FedEx as delivered (.9 hrs.); reviewed incoming case related correspondence and emails (.2 hrs.); conference	4.70

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		<u>Hours</u>
	with Mr. Miller re additional declaration needed (.1 hrs.).	
06/27/01 ACZ	Draft sections of response brief to Honeywell's Motion for summary judgment on CERCLA and NJ Spill Act claims.	5.10
DB	Organized case file room to incorporate new case files and refiled case documents as marked in the case files as necessary.	8.50
TM	Telephone conference with Mmes. Parker and Banks regarding document review (.5 hrs.); review documents supporting Grace expert reports to ensure that documents had been previously produced (1.4 hrs.).	1.90
CHM	Conference call with Knight Piesold re invoices and other issues (1.0 hrs.); conference with client re various issues regarding status of case, strategy decisions and billing issues (2.6 hrs.); prepare letter to Lowenstein Sandler re expert document production (1.1 hrs.); review correspondence on expert document productions (.7 hrs.); meeting with Mr. Condron re Grace arguments (1.2 hrs.); prepare sections of opposition on "facts" and edit other sections of brief on knowledge issues (2.0 hrs.); conference with investigator in preparation for meeting (.5 hrs.).	9.10
06/28/01 WH	Defend Dr. Davis' deposition (8.0 hrs.); confer with Dr. Davis regarding same and questions to be asked of Dr. Walters (Honeywell's groundwater expert) in his deposition (1.4 hrs.); review Brown transcript (2.2 hrs.).	11.60
CHM	Meeting with investigator in New York on witness issues (4.5 hrs.); meeting with J. Agnello to plan out next three weeks, go over	9.70

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		<u>Hours</u>
	form of pre-trial order and discuss expert discovery and opposition to Honeywell's motion (4.0 hrs.); meeting with witness in Connecticut (1.2 hrs.).	
06/28/01 AP	Calls regarding expert documents (.3 hrs.); research and draft portion of brief in opposition to Honeywell's Motion for Summary Judgment (3.7 hrs.).	4.00
BB	Research document production files and collect and prepare pertinent documents for Mr. Hughes (6.7 hrs.); continue incorporating new pleadings and correspondence into indexed case files (2.8 hrs.).	9.50
TM	Follow-up conference with Mmes. Parker and Banks regarding document review (1.0 hrs.); review documents supporting Grace expert reports to ensure that documents had been previously produced (5.3 hrs.).	6.30
06/29/01 BB	Analyze and verify supporting documents for case experts and assist Ms. Parker in the preparation of a summary report for Mr. Marraro (2.8 hrs.)	2.80
DB	Reviewed and incorporate new correspondence documents into existing case files.	3.00
TM	Analyze and verify supporting documents for Grace expert reports to ensure that documents had been previously produced (3.5 hrs.); assist Ms. Parker in the preparation of a summary report for Mr. Marraro (1.3 hrs.).	4.80
CHM	Conference with J. Agnello as follow-up to meeting (.5 hrs.); conference with investigator as follow-up to meeting (.5 hrs.).	1.00

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		<u>Hours</u>
06/29/01 TP	Made edits to chart and added additional comments explaining production of expert documents (1.3 hrs.); office conference with Ms. Pelletier re additional Chapman documents (.1 hrs.); telephone conference with Mr. Agnello re Jan. 1997 Order (.3 hrs.); office conference with Ms. Banks re confirming whether some documents listed by experts were previously produced (.4 hrs.); email from Mr. Miller re availability to execute declaration (.1 hrs.); additional clean-up on chart summarizing confirmation of production of documents (.8 hrs.).	3.00
06/30/01 BB	Prepare boxes of returned expert supporting documents for review (1.0 hrs.); incorporate new case documents and pleadings into indexed case files (2.4 hrs.); load deposition transcripts into Summation and electronic case files (1.5 hrs.); prepare deposition transcript errata sheets for case experts (.5 hrs.).	5.25

	<u>Amount</u>
Total Fees	1391.30 \$307,467.00
6/29/2001 Less Deduction of 40% of Fees in the amount of \$66,861.50 for the Period June 22, 2001 through June 30, 2001 Per Agreement	(\$26,744.60)
7/6/2001 Payment	(\$50,000.00)
Balance Due	<u>\$230,722.40</u>

Timekeeper Summary		
<u>Name</u>	<u>Hours</u>	<u>Rate</u>
Barbara Banks, Paralegal	193.20	130.00
Darlene Boozer, Legal Clerk	93.90	95.00
Natasha A. Bynum, Legal Clerk	38.00	95.00
Peter C. Condron, Counsel	67.10	335.00
William Hughes, Counsel	216.30	305.00
Keith Kaider, Paralegal	7.00	130.00

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<u>Name</u>	<u>Hours</u>	<u>Rate</u>
Anthony F. King, Partner	0.30	375.00
Tonya Manago, Sr. Paralegal	65.30	130.00
Christopher H. Marraro, Partner	181.10	420.00
Rebecca Mitchell, Paralegal	3.80	115.00
Mahmoude Moasser, Paralegal	53.00	130.00
Tamara Parker, Associate	95.40	260.00
Angela Pelletier, Associate	188.30	200.00
F. Paul Pittman, Paralegal	98.70	115.00
Reilly L. Smith, Paralegal	26.80	115.00
Sean R. Ward, Associate	7.40	165.00
Susan V. Watson, Associate	3.20	200.00
Alec C. Zacaroli, Associate	52.50	185.00

Wallace  
King  
&  
Marraro  
Branson

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August 08, 2001

W. R. Grace & Co.  
Attention: William Corcoran  
Vice President-Public & Regulatory Affairs  
7500 Grace Drive  
Columbia, MD 21044

Invoice #12254

For Professional Services Rendered in Connection with Libby, Montana - Matter 9

Professional Services:

		<u>Hours</u>	
06/01/01	CHM Conference with Dr. Goad re status of EPA's review of asbestos group study.	0.50	
06/06/01	CHM Conference with J. Spinello re request to meet with EPA (.5); conference with Mr. Corcoran re same (.2).	0.70	
06/26/01	CHM Conference call with J. Spinello.	0.50	
06/28/01	CHM Review Corcoran article to Dateline.	0.50	
			<u>Amount</u>
	Total Fees	2.20	\$924.00

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>
Christopher H. Marraro, Partner	2.20	420.00